HINSON SNIPES, LLP

ATTORNEY AT LAW
PRINCETON FORRESTAL VILLAGE
116 VILLAGE BLVD. SUITE 307
PRINCETON, NEW JERSEY 08540

TRACEY HINSON*
MAURICE SNIPES

609-452-7333 FAX: 609-452-7332 www.hinsonsnipesllp.com

- **NJ & NY BARS
- +Certified Civil Trial Attorney

April 25, 2017

VIA ELECTRONIC FILING

HONORABLE SUSAN D. WIGENTON
United States District Judge
King Fed. Bldg. & United States Courthouse
50 Walnut St., P.O. Box 999
Newark, New Jersey 07101-0999

Re: Scott Spina v.Joseph Cartagena, et al. Civil Action No.: 2:17-cv-01210 (SDW-LDW)

Your Honor:

This office represents Plaintiff Scott Spina in the above matter. Defendants have filed a Notice of Motion to Dismiss Plaintiff's Complaint Pursuant to Fed. R. Civ. P. 12(b)1 and (2) in lieu of filing an Answer, which is returnable on May 15, 2017. Plaintiff's Opposition to the motion is due on May 1, 2017.

Please be advised that I am prescheduled to attend the New Jersey Association of Justice Boardwalk Convention in Atlantic City from April 26-28, where I will be presenting on two panels. Additionally, upon my return I have several prescheduled appearances outside of my office for several days and am scheduled to start a trial in Mercer County on May 8, 2017.

Accordingly, I am respectfully requesting a three (3) week extension until May 22, 2017, to file an Opposition to Defendants' motion.

Case 2:17-cv-01210-SDW-LDW Document 5 Filed 04/25/17 Page 2 of 2 PageID: 87

Your Honor's consideration in this matter is greatly appreciated.

Respectfully submitted,

HINSON SNIPES, LLP

By: <u>/s Tracey C. Hinson, Esquire</u> Tracey C. Hinson, Esquire

cc: Kenneth L. Winters, Esquire (Via Electronic Filing)